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7 *Attorneys for Defendants*
8 *Unforgettable Coatings, Inc.;*
8 *Unforgettable Coatings of Idaho LLC*

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 JOSE ISMAEL ZUNIGA, on behalf of himself
12 and all others similarly situated,

13 Plaintiff,

14 vs.

15 UNFORGETTABLE COATINGS INC.;
15 UNFORGETTABLE COATINGS OF IDAHO
16 LLC; DOES 1 through 50; inclusive.

17 Defendants.

Case No.: 2:21-cv-01221-JCM-VCF

18 **STIPULATION TO EXTEND DEADLINE
FOR DEFENDANTS TO RESPOND TO
PLAINTIFF'S COMPLAINT**
(SECOND REQUEST)

19 IT IS HEREBY STIPULATED by and between Plaintiff Jose Ismael Zuniga, ("Plaintiff"),
20 through his counsel, Gabroy Law Offices, and Defendants, Unforgettable Coatings, Inc. and
21 Unforgettable Coatings of Idaho, LLC, ("Defendants"), by and through their counsel, Jackson
22 Lewis P.C., that Defendants shall have an extension up to and including August 6, 2021, in which
23 to file their respective responses to Plaintiff's Complaint. This Stipulation is submitted and based
24 upon the following:

25 1. Plaintiff filed his Complaint on May 25, 2021 in the Eighth Judicial District Court
26 of Clark County, Nevada, Case No. A-21-835257-C. The Summons and Complaint were served
on or about June 8, 2021.

27 2. Defendants' filed their Petition for Removal of Civil Action from State Court on
28 June 29, 2021.

1 3. Defendants' Answer is currently due July 16, 2021.

2 4. This is the second request for an extension of time for Defendants to file a
3 response to Plaintiff's Complaint.

4 5. This request is made in good faith and not for the purpose of delay.

5 6. Nothing in this Stipulation, nor the fact of entering to the same, shall be construed
6 as waiving any claim and/or defense held by any party.

7 Dated this 16th day of July, 2021.

8 GABROY LAW OFFICES

9 _____
10 /s/ Christian Gabroy
Christian Gabroy, State Bar No. 8805
Kaine Messer, State Bar No. 14240
11 Dominique Bosa-Edwards, State Bar No. 15705
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12 Henderson, NV 89012

13 Attorneys for Plaintiff

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9 _____
10 /s/ Lynne K. McChrystal
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17 Las Vegas, Nevada 89101

12 Attorneys for Defendants

14 **ORDER**

15 IT IS SO ORDERED

16 
17 U.S. Magistrate Judge

18 Dated: 7-16-2021